



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

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MEMORANDUM



SDMS DocID

270179

DATE: September 17, 1996

SUBJ: Request for Ceiling Increase at the Johns Manville Corporation Manufacturing Plant Site, Nashua, New Hampshire - **Action Memorandum - Addendum**

FROM: Paul R. Groulx, On-Scene Coordinator *D. M. Groulx*
Emergency Planning and Response Branch
Site Evaluation and Response Section I

TO: Linda M. Murphy, Director
Office of Site Remediation & Restoration

THRU: Donald F. Berger, Chief *D. F. Berger*
Emergency Planning and Response Branch

I. PURPOSE

The purpose of this Action Memorandum Addendum is to request and document approval for a ceiling increase to complete the removal action described herein.

The On-Scene Coordinator (OSC) has identified a threat to human health, welfare, and the environment at the Johns Manville Corporation Manufacturing Plant Site (the "Site"). This request incorporates information presented in the June 16, 1995 Action Memorandum and the July 30, 1996 Action Memorandum Addendum (See Site File for documents).

The OSC has determined based on continued site evaluation and assessment that conditions at the Site continue to meet the criteria for a Removal Action under the National Contingency Plan (NCP), and continue to meet the statutory exemption criteria based on the emergency waiver in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, Section 104(c)(1), 42 U.S.C. Section 9604 (c)(1). This information was compiled between July 11 and October 20, 1995 and can be obtained in the document, "Status Report", dated October 20, 1995 by Roy F. Weston. This document is a summary of sample data generated by EPA, EPA Emergency Response Team (ERT) and Superfund Technical Assistance and Response Team (START) contractors. Additional funds are being requested to complete removal actions and address the source areas of contamination at the Site.

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II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: NHD001085372
Site ID#: 2J
Category: Time-critical

A. Site Description

The Site consists of portions of the abandoned former Johns Manville Corporation Manufacturing Plant, an asbestos product facility. The 121,294 square foot (approximately 4 acres) parcel of land includes two vacant manufacturing buildings which have undergone extensive deterioration due to lack of maintenance. The topography is generally level.

The original Action Memorandum was signed on June 26, 1995 by Regional Administrator John P. DeVillars. The OSC mobilized the Emergency Response Cleanup Services (ERCS) contractor to the Site on July 11, 1995. Office of Site Remediation and Restoration Director Linda Murphy signed the first Action Memorandum Addendum, extending the \$2 million ceiling and 2 year limit, on July 30, 1996. This document is the second Addendum. Further details are contained in the above-referenced documents.

B. EPA Action To date

EPA removed the following waste during the initial Removal Action in 1995:

- 500 containers of flammable liquids and other hazardous materials;
- sludge from six underground tanks;
- PCB-contaminated oil;
- one leaking transformer containing 630 gallons of PCB oil;
- eight capacitors containing PCB oil;
- 140 cubic yards of friable asbestos waste resulting from illegal asbestos operations; and
- 600 cubic yards of combustible asbestos-contaminated waste material.

The Status Report of the Johns Manville Company Site dated October 20, 1995 and prepared by Roy F. Weston to summarize the data collected during the initial Removal Action is available from the site file in the Emergency Planning and Response Branch.

The OSC remobilized to the site on August 12, 1996 to commence demolition of building No. 10 and a portion of (the larger) building No. 40. As of this date, 60% of building No. 10 has been demolished by ERCS and the demolition process is actively proceeding.

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C. National Priority List (NPL) Status

The Johns Manville Site is not currently listed on the NPL, nor is it expected to be.

D. State and Local Authorities' Roles

The State of New Hampshire Department of Environmental Services (NHDES) Waste Management Division (the "State") and the City of Nashua (the "City") have been joint shareholders during the Removal Action. They both provided in kind financial support and have been monitoring and assisting with present operations. The State provided contractor services by pumping out six underground storage tanks, and disposing of their contents. The City has provided their landfill for disposal of asbestos waste. The OSC will continue to coordinate site activities with State and City officials.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

The Site is near residential areas and creates a potential threat for exposure to humans from friable asbestos, which is in and on the building walls, floors, and surrounding surface soil as a result of past construction and manufacturing practices. Also, baghouse ventilation pipes broken when the roof collapsed have released friable asbestos.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions Description

The OSC estimates ERCS contractor costs for complete demolition of the buildings, disposal of the debris at Nashua's landfill (at no cost to the government), and restoration of the property to be less than \$4 million. This Action Memorandum Addendum requests funding necessary to finish Phase 3, the last anticipated phase, i.e., the demolition and disposal of Building No. 40 and completion of the removal action.

B. Estimated Costs

EXTRAMURAL COSTS	Current Ceiling	Cost to Date	Proposed Ceiling
<u>Regional Allowance Costs:</u>			
- ERCS Cleanup Contractor	\$1,150,000	\$ 580,054	\$4,000,000
- Contingency costs	\$ 50,000	\$ - 0 -	\$ 500,000
<u>Other Extramural Costs Not Funded From Regional Allowance:</u>			
- START Costs	\$ 300,000	\$ 85,167	\$ 400,000
- ERT/READ Costs	\$ 90,000	\$ 3,306	\$ 90,000
- Contingency Costs	\$ 100,000	\$ - 0 -	\$ 100,000
TOTAL, EXTRAMURAL COSTS and CONTINGENCY	\$ 1,690,000	\$ 668,527	\$5,090,000
INTRAMURAL COST:			
- Direct Costs (HQ and Region)	\$ 350,000	\$ 64,220	\$ 350,000
- Indirect Costs	\$ 200,000	\$ 135,171	\$ 550,000
- Contingency Costs	\$ 100,000	\$ - 0 -	\$ 150,000
TOTAL PROJECT CEILING	\$2,340,000	\$ 867,918	\$6,140,000

C. Contribution to Remedial Performance

There are no plans for long term Remedial Action at the Johns Manville Site. Removal Action shall, to the extent practicable, contribute to the efficient performance of any anticipated long-term remedial action.

D. Compliance with ARARs

The proposed Removal Action set forth in this memorandum will comply with applicable,

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relevant, and appropriate environmental and health requirements (ARARs) to the extent practicable considering the exigencies of the situation, including requirements of the Resource Conservation and Recovery Act. The OSC has consulted with appropriate EPA staff on the proposed action.

The OSC has consulted verbally with State officials on the proposed actions, and requested in a letter dated June 30, 1995 that NHDES supply written notification regarding statutes and regulations that the State believed are potential ARARs for the Johns Manville Site. NHDES replied by letter on July 10, 1995, listing the ARARs. The OSC will keep NHDES updated throughout the Removal so that any ARARs not yet identified can be addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If no action is taken or the proposed action is further delayed, inhalation and ingestion threats posed by the asbestos at the site to the nearby residents and to workers will continue.

VII. ENFORCEMENT

The EPA Removal Enforcement group has been provided with all the background information available to pursue any and all enforcement actions pertaining to the Johns Manville Site. There has been no additional enforcement action since the 1995 funding request was approved. There are no identifiable potentially responsible parties able to adequately perform the action proposed in this memorandum. The previous enforcement strategy still applies.

VIII. RECOMMENDATION

Since the conditions at the Site meet the criteria set forth in 40 CFR 300.415 of the National Oil and Hazardous Substance Pollution Contingency Plan, I recommend your approval for the proposed ceiling increase for this Removal Action.

The total project ceiling, if approved, will be \$6.14 million, of which \$4.5 million is for extramural cleanup contractor costs.

APPROVAL: Linda M. Muzzey DATE Sept 17, 1995

DISAPPROVAL: _____ DATE _____